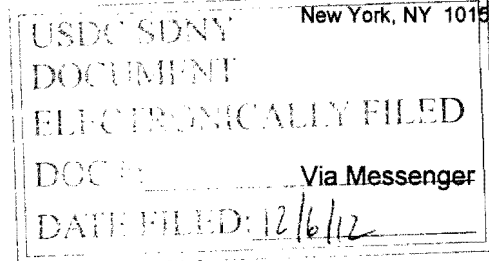




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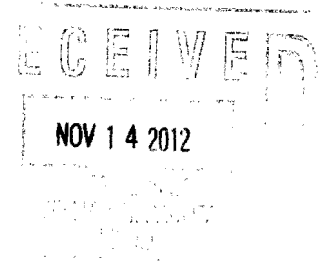
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November 14, 2012

Hon. William H. Pauley
United States District Judge
United States District Court
500 Pearl Street, Room 2210
Courtroom 11D
New York, NY 10007

MEMO ENDORSED



Re: *Hallford v. Fox Entertainment Group, Inc., et al.*, Case No. 12-civ-1806 (WHP)

Dear Judge Pauley:

We represent Defendants Fox Entertainment Group, Inc., Chernin Entertainment, LLC, Kiefer Sutherland, Peter F. Chernin and Richard Timothy Kring (collectively, "Defendants") in the above-referenced matter. We submit this joint letter on behalf of Plaintiff and Defendants to respectfully request an extension of the fact discovery deadline, presently set for December 14, 2012 (Doc. 7), to a date 60 days following a ruling on Defendants' pending Motion to Dismiss Plaintiff's First Amended Complaint (Docs. 14, 24). The Motion to Dismiss was fully submitted and argued on August 24, 2012.

The parties jointly seek this extension because the Motion to Dismiss could resolve the entire case and render the expense of discovery unnecessary. The parties have exchanged requests for production of documents and interrogatories and have provided responses and objections. The parties have also engaged in some document discovery. The parties have not, however, incurred the expense of depositions or of the complete production of documents. The parties believe that the remaining discovery—including production of documents and depositions—can be completed in a 60-day period following resolution of the Motion to Dismiss.

Pursuant to the Court's Individual Practice Rule I(E), the parties state that (1) the original fact discovery deadline is December 14, 2012; (2) the reason for this request is that the Motion to Dismiss could potentially resolve the entire case, rendering the expense of discovery unnecessary; (3) this is the parties' first request for an extension; and (4) all parties consent to the extension.

The parties respectfully request that the fact discovery deadline be extended to a date 60 days following the Court's ruling on Defendants' Motion to Dismiss. By Scheduling Order dated June 13, 2012 (Doc. 7), the Court also set a January 15, 2013 date for a joint pre-trial order, and a January 25, 2013 date for a final pre-trial conference. The parties respectfully request that each of these dates also be moved back an additional 30 days and 40 days, respectively, from the



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fact discovery deadline. Pursuant to Individual Practice Rule I(E), the parties enclose a Revised Scheduling Order to that effect.

We thank the Court for its consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jonathan Zavin', written over a printed name and title.

Jonathan Zavin
Partner

Enclosure

cc: Taso Pardalis, Esq. (via email)
Joseph D. Nohavicka, Esq. (via email)

Application granted in part and denied in part. All fact discovery shall be completed by February 25, 2013; Counsel shall submit a joint pretrial order in accordance with this Court's Individual Practices by March 11, 2013; and this Court will hold a final pretrial conference in Courtroom 20B on March 15, 2013 at 11:00 am.

SO ORDERED:

12/5/12
A handwritten signature in black ink, appearing to read 'William H. Pauley III', written over a printed name and title.

WILLIAM H. PAULEY III U.S.D.J.